



City of Seattle

Michael Patrick McGinn, Mayor

Seattle City Light

Jorge Carrasco, Superintendent

Via electronic submission

April 01, 2011

Techforum@bpa.gov

Bonneville Power Administration Transmission Services

RE: Comments on BPA Transmission Services Draft Environmental Redispatch Business Practice Version 1 posted March 18, 2011

To Whom It May Concern:

Thank you for the opportunity to comment on the *Draft Environmental Redispatch Business Practice Version 1* issued by the Bonneville Power Administration ("BPA") on March 18, 2011. Seattle City Light ("Seattle") offers the following comments.

Section - "Generators Subject to Environmental Redispatch"

Dynamically scheduled, small (less than 7 MW installed capacity), unattended thermal generating resources within BPA's Balancing Authority (BA) should not be subject to Environmental Redispatch for the following reasons:

- (1) Dynamically scheduled resources are continuously sinking to actual loads outside of BPA's BA and therefore Seattle believes that such resources do not contribute to the oversupply conditions BPA is attempting to address through this business practice.
- (2) Small generating resources (less than 7 MW installed capacity) offer diminimus amounts of relief. Applying the business practice to such small resources results in an inefficient process for obtaining relief from generation oversupply and adds to the risk that BPA's business practice may be ineffective.
- (3) Unattended small generating resources are typically going to be unable to respond and reduce generation within the delivery hour, or depending upon the timing of notice to curtail, may be unable to respond and reduce generation for the upcoming delivery hour. Consequently, these facilities will not be effective in contributing to the actual reduction of generation oversupply in BPA's BA. This issue alone negates the value of subjecting unattended small generating resources to Environmental Redispatch.



700 Fifth Avenue, Suite 3200, P.O. Box 34023, Seattle, WA 98124-4023

Tel: (206) 684-3000, TTY/TDD: (206) 684-3225, Fax: (206) 625-3709

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Sub-Section 2. of "Establishing Environmental Redispatch Minimum Generation Levels for Thermal Generators"

In addition to the reliability factors listed for consideration in establishing a thermal resources minimum generation level, BPA should explicitly include in the list the environmental operating permit constraints that may affect a thermal resources ability to reduce its generation levels below a minimum level.

If you have any questions regarding Seattle's comments, please feel free to contact either Robin H. Cross by phone at 206 684-3392 or by e-mail at robin.cross@seattle.gov, or Kurt Conger by phone at 206 386-4516 or by e-mail at kurt.conger@seattle.gov.

Sincerely,



Robin H. Cross,
Senior Power Supply Analyst, Power Contracts and Resource Acquisition Division
Power Supply & Environmental Affairs Business Unit

